

**[Parties and Counsel Listed on Signature Pages]**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION**

MDL No. 3047

Case No. 4:22-md-03047-YGR

## This Document Relates to:

## ALL NON-BELLWETHER SCHOOL DISTRICT CASES

**[PROPOSED] STIPULATION AND  
ORDER RE: LOCAL GOVERNMENT  
AND SCHOOL DISTRICT  
BELLWETHER PLAINTIFFS'  
SUPPLEMENTAL INITIAL  
DISCLOSURE STATEMENT  
PURSUANT TO FEDERAL RULE OF  
CIVIL PROCEDURE 26(A)(1)(A)(iii)**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

**WHEREAS**, after hearing arguments from both sides at a Discovery Management Conference on September 12, 2024 (“DMC”), the Court ordered that the Non-Bellwether Local Government and School District Plaintiffs (“Non-BW LGE/SDs”) begin a rolling production on February 10, 2025 of supplemental Rule 26(a)(1)(A)(iii) disclosures of past property damages and past increased hiring costs (Tr. at 41:2).

**WHEREAS**, the parties, having met and conferred following the DMC, hereby stipulate to the following rolling production of supplemental Rule 26(a)(1)(A)(iii) disclosures of past property damages and past increased hiring costs by the Non-BW LGE/SDs whose cases are on file as of the date of the entry of this Order.<sup>1</sup>

<sup>1</sup> Plaintiffs' Reservations: Continuing investigation and discovery may cause the Non-BW LGE/SD Plaintiffs to become aware of additional evidence or information that is relevant to these initial

1                   **WHEREFORE** the Court Orders the following rolling production schedule of supplemental  
 2 Rule 26(a)(1)(A)(iii) disclosures of past property damages and past increased hiring costs by the Non-  
 3 BW LGE/SDs:

<b>DATE</b>	
February 10, 2025	Non-BW LGE/SDs on Exhibit A
March 12, 2025	Non-BW LGE/SDs on Exhibit B
April 11, 2025	Non-BW LGE/SDs on Exhibit C
May 12, 2025	Non-BW LGE/SDs on Exhibit D

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 11                   **WHEREFORE**, the Court further Orders that the supplemental Rule 26(a)(1)(A)(iii)  
 12 disclosures shall be filed through MDL Centrality.

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 14                   **IT IS SO ORDERED.**

15                   DATED: September 30, 2024




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MAGISTRATE JUDGE: HON. PETER H. KANG

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 19 disclosures. The Non-BW LGE/SD Plaintiffs have sustained past, ongoing, and future damages. As  
 20 such, the estimated approximate property damages and increased hiring costs only reflect a portion  
 21 of the total damages the Non-BW LGE/SD Plaintiffs seek in this litigation. The Non-BW LGE/SDs  
 22 specifically reserve all rights to amend and supplement including reserve their right to serve expert  
 23 reports and/or amended disclosures which reflect different property and increased hiring costs and/or  
 24 total damages numbers than those provided herein based on additional information and/or expert  
 25 analysis. The Non-BW LGE/SD Plaintiffs expressly reserve the right to supplement and/or amend  
 26 their supplemental disclosures, to the extent such supplementation or amendment may be required by  
 27 the Federal Rules of Civil Procedure and/or based on additional information and/or expert analysis.  
 28 Non-BW LGE/SD Plaintiffs hereby expressly reserve all objections to the use, for any purpose, of  
 these initial disclosures, or any of the information referenced in their supplemental disclosures, in this  
 consolidated action or any other proceeding. The Non-BW LGE/SD Plaintiffs incorporate by  
 reference their Plaintiff Fact Sheets and Supplemental Plaintiff Fact Sheets, and amendments thereto.  
 The Non-SD BW Plaintiffs expressly object to producing or making available for inspection and  
 copying, as under Rule 34, any documents or other evidentiary material created or collected through  
 this process that constitutes work product or which implicates the attorney-client privilege.

1 Dated: September 27, 2024

Respectfully submitted,

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**L.R. 5-1 ATTESTATION**

I, Geoffrey M. Drake, attest that all signatories listed herein, and on whose behalf this filing is submitted, concur in this filing's content and have authorized this filing.

By: /s/ Geoffrey M. Drake  
Geoffrey M. Drake